



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

February 28, 2022

**BY ECF**

The Honorable Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: ***United States v. Lawrence Ray,***  
S2 20 Cr. 110 (LJL)

Dear Judge Liman:

Enclosed is the Government's proposed summary of the case. As indicated by the defense, *see* Dkt. 390, the parties were unable to agree on a joint proposal.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: /s/ Mollie Bracewell  
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cc: Defense Counsel (by ECF)

### **Summary of the Case**

I would like to provide a brief summary of the allegations in this case, in order to determine whether there is anything about the nature of this case which may make it difficult or inappropriate for any of you to serve on the jury.

The Government alleges that the defendant was the leader of a nearly-decade long criminal scheme that used methods of psychological and physical abuse to commit a variety of crimes, including extortion, forced labor, and sex trafficking.

The Government alleges that in about the fall of 2010, the defendant came to Sarah Lawrence College, where his daughter Talia Ray was a student, and that the defendant spent time with various of Talia Ray's roommates individually, and as a group, earning their trust.

The Government alleges that Ray began to accuse the students of damaging his property and poisoning him through hours'-long interrogation sessions that often occurred in group settings and involved physical abuse and physical, sexual, and psychological humiliation. The individual under interrogation had to make escalating "confessions" about his or her improper conduct or past traumas. These confessions were often recorded in writing, in audio, or in video. The defendant convinced the students (the Sarah Lawrence students as well as several of their siblings) that they were in debt to the defendant and that they had to repay the "damages" from the harm they had caused.

The defendant is alleged to have obtained these confessions as part of a criminal scheme to commit various crimes, including extortion, sex trafficking and forced labor. For example, the Government alleges that the defendant forced several of the students to Pinehurst, North Carolina to perform unpaid manual labor on his stepfather's property, which included

landscaping, irrigation work, and digging trenches for pipes. The Government alleges that the defendant coerced one woman to begin escorting, meaning working as a prostitute, in order to repair the supposed “damage” that she had done to him by giving him the proceeds of her commercial sex work. The defendant and his co-conspirator are alleged to have pressured this particular woman to see a higher volume of prostitution clients, including through the use of violence and threatening to bring her recorded confessions to law enforcement unless she made more “repairs.” The Government alleges that on one occasion, the defendant assaulted this woman by suffocating her with a plastic bag.

The defendant is alleged to have concealed and laundered the proceeds of his criminal activity, by using cash and other individuals’ bank accounts. In addition, the defendant is alleged to have committed tax evasion between 2015 and 2019.

The defendant is charged in Seventeen Counts, meaning charges, which I’ll set out below.